

**IN UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

7865 INDUSTRIAL DRIVE, LLC,)	
)	
Plaintiff,)	
v.)	08-cv-1147
)	
VILLAGE OF FOREST PARK and)	Honorable Judge Elaine Bucklo
ANTHINY CALDERONE,)	
)	
Defendants.)	

**DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME
TO ANSWER OR OTHERWISE PLEAD**

NOW COMES the Defendant, Village of Forest Park and Anthony Calderone ("Defendants"), by and through their attorney, Elisha S. Rosenblum, and for their Motion for an Enlargement of Time to Answer or Otherwise Plead to Plaintiff's Amended Complaint, states as follows:

1. Plaintiff has filed the above-referenced matter, asserting claims under 42 U.S.C. §1983, and for declaratory judgment and injunctive relief against the Defendants. Plaintiff asserts that the Defendants are enforcing an unconstitutional state law (65 ILCS 5/11-5-1.5) that prohibits the location of adult entertainment facilities within one mile of a school, day care center, cemetery, public park, forest preserve, public housing, or place of religious worship.
2. The undersigned was retained by the Defendants' insurance carrier to represent it in this matter on or about March 19, 2008. Plaintiff filed an Amended Complaint March 18, 2008, and the responsive pleading is due on April 1, 2008. As such, additional time is needed to evaluate the claims and defenses and to formulate an appropriate responsive pleading.
3. The Defendants request an enlargement of time to and including April 30, 2008 to file its responsive pleading. This request is not being made for purposes of prejudice or delay.
4. The undersigned has corresponded via e-mail with counsel for the Plaintiff, and counsel for the Plaintiff has informed the undersigned that there is no objection to this motion.

WHEREFORE, the Defendants, Village of Forest Park and Anthony Calderone, respectfully request an enlargement of time to and including April 30, 2008 to answer or otherwise plead to Plaintiff's Amended Complaint.

**VILLAGE OF FOREST PARK
ANTHONY CALDERONE**

By: s/Elisha S. Rosenblum
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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2008, I electronically filed Defendants' Motion For Enlargement Of Time To Answer Or Otherwise Plead with the Clerk of Court using the CM/ECF system that will send notification of such filing to the following:

Stan C. Sneeringer
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